

JLG:JRS
F. # 2024R00854

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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24-MJ-588

UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. §§ 2252(a)(2) and 2252(b)(1))

RENEE HOBERMAN,
also known as "Rina,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DEBRA GERBASI, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

DISTRIBUTION OF CHILD PORNOGRAPHY

In or about and between June 2024 and October 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RENEE HOBERMAN, also known as "Rina," did knowingly and intentionally receive and distribute one or more visual depictions, to wit: the digital video and images depicted in the following computer files: (a) ba411c9c-7beb-47ec-9637-0cc4a4a8b0bc.mp4; (b) 3b1c70d2-b557-4d72-b49c-dd2027e9dd38.mp4; and (c) 94fe1e63-4d8d-497f-a6df-fc39ca3624cf.mp4, using a means and facility of interstate and foreign commerce, which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any

means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with HSI and have been involved in the investigation of numerous cases involving criminal violations relating to the sexual exploitation of children, including the illegal production, distribution, transportation, receipt, and possession of child pornography. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and reports of other law enforcement officers involved in the investigation.

2. The National Center for Missing and Exploited Children ("NCMEC") is a private, non-profit organization founded by Congress in 1984. Among its many functions, NCMEC receives tips regarding missing, abducted, or sexually exploited children. NCMEC also maintains a "CyberTipline" to receive complaints from internet service providers, electronic service providers, and other online entities. NCMEC analysts review CyberTipline reports and forward them to the appropriate law enforcement agency for further investigation.

3. Between approximately June 7, 2024 and October 16, 2024, NCMEC received a number of CyberTips reporting the uploading of files containing child sexual abuse

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

materials, or child pornography, by social media accounts that belonged to, and were used by, the defendant RENEE HOBERMAN, also known as “Rina,” as set forth further herein.

4. To date, law enforcement agents have reviewed fourteen such “CyberTips” that were reported to NCMEC by Kik Messenger (“Kik”).² These include CyberTips indicating that child pornography was uploaded from accounts with the following display names: “spnkdcollgegirl,” “collegegirlspnkd,” “introublepaddled,” “schoolgrl124,” “Spankedgurl 323,” “badgurl854,” “prettyprncss2388,” “AlwayzSpnkednkd,” “badgurl32388,” “dddyspnksnkd,” “Naked Spanking,” “spnkdbydad,” “Daddywhospans Naked,” and “troublegirl2434.”³ Some of these CyberTips and related images/videos are described in additional detail below.

5. On or about June 25, 2024, Kik reported to NCMEC that on June 7, 2024, a user with the display name “Spankedgurl323,” the screen name “naughtygirl323567788,” the

² Kik Messenger, commonly called “Kik,” is a freeware instant messaging mobile and social networking application (or “app”) from the Canadian company Kik Interactive, Inc., which is designed for chatting or messaging communications. According to publicly-available information (including “Kik’s Guide for Law Enforcement”), to use this application, a user downloads the application to a mobile phone, computer, or other digital device via a service such as the iOS App Store, Google Play Store, Apple iTunes, or another similar provider. Once the application is downloaded and installed, the user is prompted to create an account and username. The user also creates a display name, which is a name that other users see when transmitting messages back and forth. Once the user has created an account, the user is able to locate other users via a search feature. While messaging, users can then send each other text messages, images, and videos.

³ Each of these Kik accounts is associated with one of the following email addresses believed to belong to the defendant RENEE HOBERMAN, also known as “Rina”: reeneh323@yahoo.com, rhobermanlmsw@gmail.com, rsh323@gmail.com, rsh32388@gmail.com, rhobermanlcsww@gmail.com, and reeneh3231@yahoo.com.

associated email address rhobermanlmsw@gmail.com,⁴ and which utilized the IP address 69.125.76.245 (hereinafter, the “245 IP Address”), uploaded a total of 6 images/videos containing child pornography.

6. I have reviewed one of these videos with the filename “ba411c9c-7beb-47ec-9637-0cc4a4a8b0bc.mp4.” This video is approximately 17 seconds long and depicts an infant, approximately six months to one year of age, lying naked, in a prone position and being penetrated from behind by an adult male’s penis, as the adult male physically restrains the child with his hands. The child can be heard frantically screaming for the duration of the video. Additionally, the voice of what is seemingly the adult male engaging in the act can be heard conversing in a foreign language along with the voice of what is seemingly an adult female who is also present.

7. On or about September 9, 2024, Kik reported to NCMEC that on September 2, 2024, a user with the display name “badgurl854,” the screen name “badgurl854,” the email address reneeh323@yahoo.com, and which utilized the same 245 IP Address, uploaded 14 images/videos containing child pornography.

8. I have reviewed one of these videos with the filename “3b1c70d2-b557-4d72-b49c-dd2027e9dd38.mp4.” This video is approximately 48 seconds long and depicts an infant female, approximately one year of age, fully naked, sitting on the lap of a fully naked adult male, who is anally penetrating the child from behind with his penis, as the child cries and frantically screams for the duration of the video.

⁴ Based on publicly-available information, HOBERMAN appears to be a licensed Master Social Worker and a Licensed Clinical Social Worker, which correspond, respectively, to the abbreviations “lmsw” and “lcsw” in certain of the email addresses associated with this and other Kik accounts.

9. Additionally, I have reviewed another video uploaded by the Kik user “badgurl854” with the filename “94fe1e63-4d8d-497f-a6df-fc39ca3624cf.mp4,” which is approximately one minute and 52 seconds long and depicts an approximately one to two year old female, lying on her back with legs raised and knees bent, white underwear pulled to one side, exposing the child’s vagina and anus, the child crying and frantically screaming, while being vaginally penetrated by the adult male’s penis. The adult male then manipulates the child into a prone position, where the child lies limp and virtually motionless, as the adult male penetrates the child from behind with his penis.

10. On or about October 16, 2024, Kik reported to NCMEC that a user with the display name “AlwayzSpnkednkd,” and the email address rhobermanlcs@gmail.com engaged in “chats” with multiple other Kik users concerning child sexual molestation. I have reviewed some of these “chats.” In sum and substance and in relevant part, this user, purporting to be a man, claimed to have multiple minor children. The user further claimed that “he” would have anal sex with the children and would punish the children by getting naked, stripping the children naked, and spanking them while the other children watched. The user invited another user to visit “his” family in New York to spank the children. In addition, the user described sexually abusing “his” children and their friends, and then sent two videos containing child sexual abuse material, claiming that these videos depicted the user’s own children.

11. I have also reviewed subpoenaed materials obtained from Optimum. These records revealed, in substance and in relevant part, that the 245 IP Address is an active Optimum IP address and has been since July 14, 2018. The subscriber for this Optimum account is a relative of the defendant RENEE HOBERMAN, also known as “Rina,” and the

registered address is the physical address of a certain residence in Plainview, New York, where HOBBERMAN resides and where she was arrested this morning, as set forth below.

12. Based on my review of records returned from Kik, I have learned, in substance and in relevant part, that the defendant RENEE HOBBERMAN, also known as “Rina,” has subscribed to at least 14 different Kik accounts. Certain of these accounts are described in additional detail below.

13. The subscriber information for Kik user “Spankedgurl323” reflects that the user account was active and was registered in May 2024, the user’s first name is listed as “Spankedgurl,” the user’s last name is listed as “323,” and the electronic device registered to this account is an iPhone. The Kik records show that the 245 IP Address was used to register this Kik account and to log into it on several occasions.

14. The subscriber information for Kik user “badgurl854” reflects that the user account was active and was registered in August 2024, the user’s first name is listed as “badgurl854,” and the user’s last name is listed as a blank space. The Kik record show that the 245 IP Address was used to register this Kik account and to log into it on several occasions.

15. Based upon a review of public records and internet-based searches, it appears that the defendant RENEE HOBBERMAN, also known as “Rina,” works as a therapist with an organization based in Melville, New York and serves children aged 0-17. The profile page for a Facebook account with the name “Rina Hoberman,” and several photographs depicting a person who appears to be HOBBERMAN, indicates that HOBBERMAN has been employed by this organization from 2022 to the present, has been employed as an assistant counselor at a hospital in Amityville, New York that provides mental health services to children,

adolescents, and adults from 2016 to the present; and was employed as a daycare provider at a daycare in Lindenhurst, New York from 2013 to 2016.

16. On October 23, 2024, I, along with other law enforcement officers, executed a warrant to search and seize, docketed as 24-MJ-584. This warrant was authorized by the Honorable Arlene R. Lindsay, United States Magistrate Judge for the Eastern District of New York, on October 21, 2024. In sum, the warrant authorized the search of the residence of the defendant, RENEE HOBERMAN, also known as “Rina,” in Plainview, New York, and of HOBERMAN’s person, as well as the search and seizure of any and all electronic devices and cellular telephones for evidence, fruits, and instrumentalities of the following violations of federal law: Title 18, United States Code, Sections 2251 (sexual exploitation of children), 2252 (transportation, receipt, distribution, and possession of material involving sexual exploitation of minors), and 2252A (transportation, receipt, distribution, and possession of child pornography).

17. Pursuant to this search warrant, law enforcement officers seized a number of electronic devices that were in the possession of the defendant RENEE HOBERMAN, also known as “Rina,” including an iPhone Pro Max cellphone (hereinafter, the “Cellphone”). HOBERMAN admitted to the officers that the Cellphone belonged to her, she handed the Cellphone to the officers, and she voluntarily provided the officers with the password necessary to unlock the Cellphone.

18. Upon initial review of the Cellphone, pursuant to the search warrant, officers observed communications originating from the defendant RENEE HOBERMAN, also known as “Rina,” via the social media application Telegram in which HOBERMAN transmitted files containing child pornography to multiple other individuals.

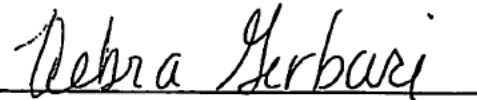
19. Additionally, during their initial review of the Cellphone, officers observed several videos depicting child pornography saved in the "Hidden Photos" folder. Certain of these videos had previously been reported to NCMEC. One such video is approximately 48 seconds long and depicts an infant female, approximately one year of age, fully naked, sitting on the lap of a fully naked adult male, who is anally penetrating the child from behind with his penis, as the child cries and frantically screams for the duration of the video. Another video is approximately one minute and 52 seconds long and depicts an approximately one to two year old female, lying on her back with legs raised and knees bent, white underwear pulled to one side, exposing the child's vagina and anus, the child crying and frantically screaming, while being vaginally penetrated by the adult male's penis. The adult male then manipulates the child into a prone position, where the child lies limp and virtually motionless, as the adult male penetrates the child from behind with his penis.

20. On October 23, 2024, the defendant RENEE HOBERMAN, also known as "Rina," waived her Miranda rights and agreed to speak with law enforcement. In sum and substance and in relevant part, HOBERMAN admitted that she used several Kik accounts to upload images and videos depicting child pornography. HOBERMAN further stated that the email accounts reneeh323@yahoo.com, rhobermanlmsw@gmail.com, rsh323@gmail.com, rsh323@gmail.com, rsh32388@gmail.com, rhobermanlcsww@gmail.com, and reneeh3231@yahoo.com belonged to her. Further, HOBERMAN admitted to uploading images and videos depicting child pornography onto the social media applications Kik, Telegram, Discord, and WhatsApp. HOBERMAN confirmed that she knew that it is illegal to possess and transmit child pornography, and was concerned about being caught, due to the consequences;

therefore, she has, in the past, deleted accounts she has used to upload child pornography.

HOBERMAN also stated, in sum and substance and in relevant part, that she is sexually aroused and gratified by children, with a preference for children from infancy to age three, and that she prefers violent depictions of the children in child pornography.

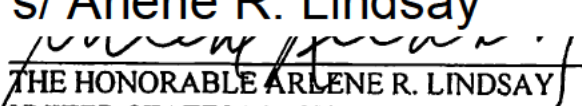
WHEREFORE, your deponent respectfully requests that the defendant RENEE HOBERMAN, also known as "Rina," be dealt with according to law.



DEBRA GERBASI
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
23rd day of October, 2024

s/ Arlene R. Lindsay



THE HONORABLE ARLENE R. LINDSAY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK